

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

JAMES E. SHELTON, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

COMMITTEE FOR POLICE  
OFFICERS DEFENSE PAC

Defendant.

**CASE NO.**

2:24-cv-04679-GAW

**JURY TRIAL DEMANDED**

**PLAINTIFF’S NOTICE OF SUPPLEMENTAL AUTHORITY  
IN OPPOSITION TO DEFENDANT’S MOTION TO DISMISS**

Plaintiff respectfully files this Notice of Supplemental Authority in Opposition to Defendant Committee for Police Officers Defense PAC’s Motion To Dismiss. Today, Judge McHugh of this Court denied a nearly identical motion to dismiss in one of Mr. Shelton’s other cases, *Shelton v. Pro Source Lending Group LLC*, No. 24-4394. A copy of the opinion is enclosed herein as Exhibit A.

The opinion is notable in that it addresses the Plaintiff’s standing and application of the Plaintiff’s prior case of *Shelton v. Target Advance LLC*, also relied upon by the Defendant here. The Memorandum Opinion also applies, and rejects, the other authorities relied upon by the Defendant here, including distinguishing *Stoops v. Wells Fargo Bank, N.A.*, 197 F. Supp. 3d 782 (W.D. Pa. 2016), where the plaintiff there was held not to have standing, *inter alia*, because she have at least thirty-five cellphones that she kept with the specific intent of manufacturing TCPA claims.

In light of the foregoing authority, the Defendant's Motion to Dismiss must therefore be denied.

RESPECTFULLY SUBMITTED AND DATED this March 14, 2025.

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**CERTIFICATE OF SERVICE**

I certify that I filed the foregoing via ECF on the below date.

Dated: March 14, 2025

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